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17 *Attorneys for Defendant Bristol-Myers Squibb Company*

18 [Additional Counsel Listed At Signature Page]

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 JAMES BLAIR *et al.*,

23 Plaintiff,

24 v.

25 BRISTOL-MYERS SQUIBB COMPANY,
26 MCKESSON CORPORATION, and
27 DOES 1 to 100,

28 Defendants.

No. 14-2515 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY
LITIGATION PENDING TRANSFER TO
THE PLAVIX® MDL**

Judge: Hon. Edward M. Chen

1 This Joint Stipulation is made by and between Plaintiffs in *Blair et al. v. Bristol-Myers*
2 *Squibb Co. et al.*, No. CV-14-2515 EMC (N.D. Cal.), and Defendant Bristol-Myers Squibb
3 Company (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record,
4 with reference to the following facts:

5 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation
6 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to
7 Judge Freda Wolfson;

8 2. WHEREAS, on May 30, 2014, Plaintiffs filed the *Blair* action in the Superior Court
9 of California, San Francisco County;

10 3. WHEREAS, on June 2, 2014, the *Blair* action was removed to this Court by
11 Defendant BMS;

12 4. WHEREAS, on June 11, 2014, Defendant BMS tagged this case for transfer to the
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case
14 soon; and

15 5. WHEREAS, the parties agree that the *Blair* action should be stayed pending its
16 anticipated transfer to the Plavix® MDL in the District of New Jersey.

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18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s
19 approval, that the *Blair* action should be stayed pending its anticipated transfer to the Plavix® MDL
20 in the District of New Jersey.

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22 **IT IS SO STIPULATED.**
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Dated: June 11, 2014

Joshua C. Ezrin
AUDET & PARTNERS, LLP
221 Main Street, Suite 1460
San Francisco, CA 94105

Daniel C. Burke
PARKER WAICHMAN LLP
6 Harbor Park Drive
Port Washington, New York 11050

By: /s/ Joshua C. Ezrin
Joshua C. Ezrin

Attorney for Plaintiffs

Dated: June 11, 2014

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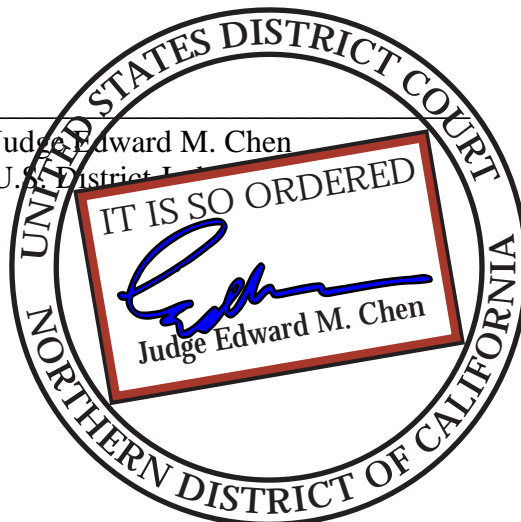
By: /s/ Sharon D. Mayo
Sharon D. Mayo

Attorney for Defendant
Bristol-Myers Squibb Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 6/13/14

Judge Edward M. Chen
U.S. District Court



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this
4 filing.

5
6 Dated: June 11, 2014

ARNOLD & PORTER LLP

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8 By: /s/ Sharon D. Mayo

9 Sharon D. Mayo

10 *Attorney for Defendant*
11 *Bristol-Myers Squibb Company*
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